

Exhibit 2

Richardson Declaration

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

FRIENDS OF THE EVERGLADES, *et al.*,

Plaintiffs,

v.

KRISTI NOEM in her official capacity as
Secretary of the UNITED STATES
DEPARTMENT OF HOMELAND
SECURITY, *et al.*,

Defendants.

Civil Action No.
1:25-cv-22896-JEM

DECLARATION OF DAVID RICHARDSON

I, David Richardson, declare as follows:

1. I am the Senior Official Performing the Duties of the Administrator at the Federal Emergency Management Agency (“FEMA” or “agency”). FEMA is a component within the U.S. Department of Homeland Security (“DHS”). As the Senior Official Performing the Duties of the FEMA Administrator, I am the DHS official responsible for being the principal advisor to the President and Secretary of Homeland Security (“Secretary”) for all matters related to emergency management in the United States. I am also vested with the authority to manage and administer the various grant programs assigned to FEMA directly by statute or through delegation from the Secretary. I am familiar with the grant programs administered by FEMA and the policies and procedures governing these programs.
2. My statements in this Declaration are based on my personal knowledge, on information provided to me in my official capacity; on reasonable inquiry; information obtained from various records, systems, databases, DHS, or FEMA employees and information portals maintained and relied upon by the DHS in the regular course of business; and on my evaluation of that information.

3. DHS/FEMA announced \$600 million in federal funding for the Detention Support Grant Program (DSGP). The DSGP will provide financial assistance through a federal award to support sheltering of illegal aliens in a detention environment and related activities to avoid overcrowding in U.S. Customs and Border Protection short-term holding facilities. The only eligible applicant under the DSGP is the Florida Division of Emergency Management.
4. Once the DSGP is finalized, DHS/FEMA will send the Florida Division of Emergency Management a grant notification letter. The grant notification letter is the official communication from DHS/FEMA that explains the grant application process and will include proposed terms and conditions of the grant including allowable costs. The Florida Department of Emergency Management must then apply for a DSGP federal award. The Florida Department of Emergency Division has not yet applied for a DSGP award, and DHS/FEMA has not yet approved a federal award. I am not aware of any other grant applications that Florida has submitted to FEMA in connection with the temporary detention center at issue in this case.
5. Costs for constructing new, permanent buildings are not allowable under the DSGP.

I, David Richardson, declare under penalty of perjury that the foregoing is true and correct.

Executed on July 2 2025

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David Richardson
Senior Official Performing the Duties of the
Administrator
Federal Emergency Management Agency